

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

**CERTIFICATE OF NO RESPONSE AND
REQUEST FOR ENTRY OF ORDER**

I, Charles Laputka, Esquire, counsel for the Debtor, hereby certify the following:

1. The Motion for Modification of Plan Post Confirmation was timely served on all interested parties as is shown on the certificate of service previously filed with the Motion.
 2. The deadline for response to the Motion was October 30, 2019.
 3. No objections, responses, or requests for hearing on the Application have been received, and as of November 6, 2019 a check of the electronic entries docketed in this case confirms that no objections, responses, or requests for hearing on the Application have been filed.
 4. Once an Order is entered by the Court, Counsel will file the 3rd Amended Plan and make the correction to paragraph 2(a)(2) to remove the old Plan payment amount.

WHEREFORE, Movant seeks the entry of the proposed order filed with the motion, granting the requested relief.

Dated: November 6, 2019

/s/ Charles Laputka, Esquire
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